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1 A. No.
2 Q. Does she ask who her father might be?
3 A. Yes.
4 Q. What do you tell her?
5 A. I'm looking; can't find him.
6 Q. But you give her the impression that you know who he
7 is?
8 A. Yes.
9 Q. I'm asking you these questions so I don't have to ask
10 them. I really don't want to ask them, so I thank you
11 for your candor, and I won't have to. I can leave
12 that alone.
13 MR. HUGHES: Do you want to take a break?
14 You can. Are you all right?
15 THE WITNESS: Uh-huh.
16 MR. HUGHES: Okay.
17 BY MR. GOLDSTEIN:
18 Q. In that claim that you had against the Art Van
19 accident, were you deposed in that case, like you are
20 today?
21 A. Yes.
22 Q. Were any of your children deposed in that case?
23 A. No.
24 Q. Okay. On September 11th, 2007, something big happened
25 to you and your family. Okay? I'm going to now focus

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1 attention on that. Even though your attorney just
2 asked you if you wanted to take a break, you still
3 seem upset from the question, and I'm going to invite
4 you again to take a break to gather yourself.
5 A. Yes, I will.
6 MR. GOLDSTEIN: Let's go off the record.
7 (Recess taken at 10:49 a.m.)
8 (Back on the record at 10:53 a.m.)
9 BY MR. GOLDSTEIN:
10 Q. We're back on the record. You have indicated that you
11 might have a recollection of Mr. Karl Anthony
12 Henderson?
13 A. Yes.
14 Q. Go ahead.
15 A. He also was a sexual partner back in the '90s, '96.
16 Q. Do you know why you would be pursuing child support
17 from him in 2005?
18 A. He was a sexual partner.
19 Q. You think he might have been a parent of one of your
20 children?
21 A. Kartier's, yes, sir.
22 Q. Is there an ongoing paternity dispute with
23 Mr. Henderson?
24 A. No.
25 Q. How did that case resolve? Was it determined that he

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1 was not the father?
2 A. Yes, it was determined he was not the father.
3 Q. All right. Are you on any medication right now?
4 A. Pain.
5 Q. What medication?
6 A. Tramadol and -- Tramadol -- I hope I'm saying that
7 right -- and Motrin.
8 Q. Tramadol, do you know what that is?
9 A. Pain.
10 Q. I know that's what it is for, but do you know what is
11 in it?
12 A. No.
13 Q. Do you know if it's an opiate or anything that might
14 mess up your thinking?
15 A. No, I don't know.
16 Q. Do you perceive that it interferes with your ability
17 to think and remember?
18 A. I don't know. I don't know if it's --
19 Q. If it does, you haven't detected it. Correct?
20 A. Correct.
21 Q. How about the Motrin?
22 A. What's the question?
23 Q. Does that interfere with your ability to think and
24 remember?
25 A. No.

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1 Q. On September 11th, 2007, you were living on 154 North
2 Genesee. Is that correct?
3 A. Correct.
4 Q. With regard to the allegations in your Complaint, what
5 was your first knowledge that something was going on?
6 A. The look on my son's face.
7 Q. When you looked in your son's face, which son was
8 that?
9 A. Kourdon Maxwell.
10 Q. Where were you when you looked in his face?
11 A. Cooking in the kitchen.
12 Q. He was in the kitchen also?
13 A. Yeah. He came into the kitchen, yes. Yes.
14 Q. He came in from outside?
15 A. Yes.
16 Q. From a back door?
17 A. Yes.
18 Q. And what did you see in his face?
19 A. Terrified.
20 Q. Okay. Did he -- when he came in the door, did he come
21 directly to you, or did he just stop at the door or
22 what?
23 A. He came directly to me.
24 Q. And how far away were you from the door?
25 A. Approximately three -- four -- four feet.

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1 Q. Okay. What were you doing in the kitchen before he
2 came in?
3 A. Cooking.
4 Q. Do you remember what time this was?
5 A. I would say probably around 8:00-ish. 8-ish o'clock.
6 Q. You saw his face?
7 A. Uh-huh.
8 Q. How did you react? What did you do?
9 A. I immediately looked at the door.
10 Q. What did you see there?
11 A. The door was closed at first, and then it opened.
12 Q. Okay. And this is before you and Kourdon had
13 exchanged any words. Correct?
14 A. Well, no. As I looked at the door, he was talking to
15 me.
16 Q. Kourdon was talking to you?
17 A. Yes.
18 Q. What did he say?
19 A. "Mom, I think some men is chasing me."
20 Q. And then what did you see when the door opened?
21 A. A white man come busting in the door.
22 Q. Did he break any part of the door?
23 A. No.
24 Q. All right. Did you get -- at that point, did you get
25 a clear view of the white man, his face, his clothes?

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1 A. Yes.
2 Q. Can you describe him?
3 A. Yes. Excuse me. This is how I describe him. Hulk
4 Hogan. I think of Hulk Hogan; blond, hair back in a
5 ponytail, nice shaven, sideburns, clear-cut back,
6 because there was a pony --
7 Q. His neck was clear-cut?
8 A. It appeared to me it was lined up. White T-shirt,
9 camouflaged pants. Just muscles.
10 Q. Okay. And any glasses or no glasses?
11 A. No glasses.
12 Q. All right. So your son comes in. The door is shut.
13 He is telling you a man or men are chasing him? Which
14 is it?
15 A. "Mom, I think men are chasing me."
16 Q. Plural?
17 A. Uh-huh.
18 Q. Yes?
19 A. Yes.
20 Q. As he is telling you that, you see the back door open,
21 and Hulk Hogan comes in?
22 A. Yes.
23 Q. Then what happens?
24 A. "Ma'am, get out of our way."
25 Q. Is that what he says to you?

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1 A. Yes, he does.
2 Q. How far in the house does he come?
3 A. He came up the steps. He came into the house.
4 Q. So there is steps on the outside?
5 A. There is steps on the inside from the back door. When
6 you open the back door, there's a little landing, a
7 couple of steps, and you're in the kitchen.
8 Q. And he came up the steps?
9 A. Yes.
10 Q. He says to you, "Ma'am, get out of our way"?
11 A. "Ma'am, get --" Yeah. "Ma'am, get the fuck out of
12 our way," and somewhere around in that area --
13 Q. And then what happened?
14 A. -- I block -- blocked, because I have a refrigerator
15 right there and a cabinet.
16 Q. There is a refrigerator to your right and a cabinet to
17 your left?
18 A. So I blocked and said, "Wait a minute. Wait a minute.
19 What the fuck are you doing? What the fuck are you
20 doing?"
21 Q. And Kourdon is behind you?
22 A. Kourdon was behind me. He is behind me. "Ma'am --
23 ma'am, we just want the boy."
24 "Wait a minute. I don't understand. Why
25 are you in my house?"

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1 "Boy, don't you fucking move."
2 "Wait. Who are you talking to like that?
3 You come in my house."
4 And, "Ma'am, we asked you to get out of the
5 way. All we want is the boy."
6 And I wouldn't get out of the way, so he
7 starts trying to pull me out of the way, and I -- what
8 more -- it goes --
9 Q. Keep going, if you don't mind. I'll ask you if you
10 want me to ask you what's next every time, but that's
11 what I would be doing.
12 A. He goes to grabbing me, trying to pull me out of the
13 way to get to my child. I would not let him get to my
14 child.
15 Q. Where did he grab you?
16 A. He is grabbing my shirt and my clothes and I'm, like,
17 "No."
18 Q. Up here by your shoulders and your neck bone?
19 A. Yes. Yes.
20 Q. All right. With one hand or two? You don't remember?
21 A. I don't know. We scuffled. No, I can't.
22 Q. That's okay. That's fine.
23 So he tries to pull you out of his way?
24 A. Uh-huh.
25 Q. That's a yes?

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1 A. Yes.
2 Q. Does he get you out of his way?
3 A. No.
4 Q. Then what happens? He keeps pushing on you?
5 A. He's fighting with me, because I'm trying to protect
6 my son.
7 Q. Right. Does he hit you with a closed fist?
8 A. Yes.
9 Q. Where?
10 A. Here, because he's trying to -- because I'm holding
11 onto him. I'm holding onto him, because I don't want
12 him to get to my baby. So he is punching me to get me
13 off of him.
14 Q. So you have, like, grabbed him?
15 A. Uh-huh.
16 Q. Are you, like, in a bear hug situation to keep him
17 from getting in?
18 A. No, I'm like this.
19 Q. You've got your hands in front of you, like, you
20 grabbed his shoulders?
21 A. Yes. Yes; you cannot get in, yes.
22 Q. And what -- and he is trying to -- he is trying to
23 break your -- your grip on his shoulders? Is he
24 hitting your arm?
25 A. He is hitting my arm. He is hitting everywhere to get

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1 me off of him.
2 Q. Specifically, where do you recall him hitting you?
3 A. In my face. In my face.
4 Q. Is it with a closed fist or open hand or --
5 A. Closed fist. It was a closed fist.
6 Q. Okay. How many times does he hit you?
7 A. Many times.
8 Q. Does he ever break your grip on him?
9 A. Yeah. Some -- just a little bit. Somewhat.
10 Q. Okay.
11 A. Because I'm now defending myself.
12 Q. Right. Then what happens?
13 A. He is pulling me to try to get me out of the way,
14 because I'm still in this doorway, and my son is
15 behind me. So he is really trying to get me and him
16 out of the way so he can get around. This is what I'm
17 assuming --
18 Q. Right.
19 A. -- to get around to my son.
20 So we're hanging around this door area, as
21 long as I possibly can so he doesn't get to my son,
22 before he yanks me outside with me screaming and
23 hollering and stuff. I noticed now he is trying to --
24 he has a plastic bag in his hand, and he is trying to
25 get my --

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1 Q. Who has a plastic bag?
2 A. This police officer.
3 Q. Hulk Hogan?
4 A. Yes, he does.
5 Q. Did he have this plastic bag in his hand when he came
6 into the house?
7 A. I don't know.
8 Q. When did you first see the plastic bag? When you were
9 outside?
10 A. When we came -- yes, almost outside. We were halfway
11 in the door.
12 Q. So when he is taking you outside, you see he has this
13 in his hand?
14 A. In his hand.
15 Q. Do you have a belief that he had it in his hand the
16 whole time or what?
17 A. I don't know.
18 Q. That's fine.
19 A. I don't know.
20 Q. Do you remember seeing both of his hands free of
21 anything prior to that?
22 A. I don't know. His hands was always balled up.
23 Q. So he might have had it in his hands the whole time?
24 A. He might have.
25 Q. But you don't know?

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1 A. I don't know.
2 Q. All right. That's fine.
3 Then he is taking you outside. Correct?
4 A. Uh-huh.
5 Q. Is that a yes?
6 A. Yes.
7 Q. Then what happens?
8 A. He is scuffling now. "Ma'am, give me your hand. Give
9 me your arm. Give me your arm." And this is when I
10 notice he is trying to put something in my arm, and
11 now I'm really trying to fight for my life, because I
12 don't know what he is trying to do to me.
13 Q. How do you know he is trying to put something in your
14 arm?
15 A. Because he is pulling my fingers. He is prying my
16 fingers open. He is trying to pry my fingers open.
17 Q. What were you doing? Were you still trying to defend
18 yourself?
19 A. Defend myself.
20 Q. Were you still trying to protect your son?
21 A. Now it's myself.
22 Q. How were you trying to defend yourself at this point?
23 A. I'm fighting back.
24 Q. Were you trying to hit him?
25 A. Yes.

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1 Q. Are you hitting him with closed fists?
2 A. Probably so, yes.
3 Q. So you think he is trying to put something in your
4 hand because he is opening your fist?
5 A. He is opening my fingers, yes. He is really prying on
6 my fingers.
7 Q. Does he succeed?
8 A. No, he does not.
9 Q. Okay.
10 A. No, he does not.
11 Q. Does he ever put anything in your hands?
12 A. No. No, he does not.
13 Q. Then what happens?
14 A. Now he is upset. I could tell he is disappointed that
15 he couldn't do what he wanted to do, so now he just
16 rips my arm behind my back. I think I said a couple
17 of words, agitating -- he just seemed like he was so
18 agitated by what I said and socked me in the face.
19 Q. Okay.
20 A. What more can I say?
21 Q. Let's hold a second, and let me ask you some follow-up
22 questions.
23 Before he put your arm behind your back,
24 you indicated, as I understood, that he was now upset
25 with you.

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1 A. Upset by me not releasing my hand. Yes.
2 Q. Did he say, "I'm upset with you because you did not
3 release your hand"?
4 A. No.
5 Q. What about his behavior changed at that point for you
6 to reach the conclusion that he was now upset at you?
7 He was already fighting you. Correct?
8 A. He is hitting harder.
9 Q. He is hitting harder?
10 A. He is hitting harder. He's becoming more forceful.
11 Q. When he is putting your arm behind your back, he is
12 more forceful?
13 A. Uh-huh. He's more forceful when I'm not cooperating
14 with my fist.
15 Q. Was he -- so after he tried to open your fist and that
16 didn't work, what did he do? What was his next
17 physical action? Was that when he put your arm behind
18 your back?
19 A. Yes, yanked me. Hit me behind the leg.
20 Q. What did he hit you behind the leg with?
21 A. I don't know. I --
22 Q. And then you went to the ground?
23 A. Uh-huh.
24 Q. Is that a yes?
25 A. Yes.

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1 Q. All right. So aside from him yanking your arm behind
2 your back and doing something to your legs to get you
3 to the ground, did he hit you again?
4 A. Yes.
5 Q. Was that after you were on the ground?
6 A. Yes, after I'm on the ground.
7 Q. How did he hit you when you were on the ground?
8 A. On the ground, I said a couple of words to him. He
9 didn't like what I said. He sprayed me in the eyes
10 with pepper spray.
11 Q. What were the words that you said to him that he
12 didn't like?
13 A. Something more of, "You punk bitch. How does it feel
14 to hit a woman?"
15 Q. You said something along those line?
16 A. Something along those lines. "You feel like a man
17 now? You feel manly?"
18 Q. And then he --
19 A. Just, you know, shh shh shh (phonetic), like a shut up
20 type of spray, and then I said more. "You a real man.
21 That makes you a man. You still can't break me," type
22 of thing, and that's when I get the last hard hit on
23 the ground.
24 Q. Okay. Where does he hit you?
25 A. The jaw.

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1 Q. You're already on the ground?
2 A. I'm already on the ground --
3 Q. And he hits you in the jaw?
4 A. -- and I'm handcuffed.
5 Q. Okay. Did he handcuff you after he sprayed you?
6 A. No, he handcuffed me first.
7 Q. He handcuffed you first --
8 A. Uh-huh.
9 Q. -- and then he sprayed you after you --
10 A. Uh-huh.
11 Q. -- made those comments?
12 A. Yes, yes, yes.
13 Q. When you said that to him, were you trying to turn
14 around to face him, to say it to his face?
15 A. Yes, yes. After the spray.
16 Q. Now, before he sprayed you --
17 A. I was --
18 Q. -- you made those comments to him?
19 A. I made those comments, and to be honest with you, the
20 moon was right there, so I'm looking to the moon
21 spiritually.
22 Q. So you are looking to the moon. Is he behind you when
23 you are looking to the moon?
24 A. He is beside me.
25 Q. Did you have to twist or turn to look at the moon?